

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

NELSON L. BRUCE,)	
)	
Plaintiff,)	
)	
v.)	
)	
PENTAGON FEDERAL CREDIT UNION)	
a/k/a PENTAGON FEDERAL CREDIT)	
UNION FOUNDATION, EXPERIAN)	CASE NO.: 2:22-cv-02211-BHH-MGB
INFORMATION SOLUTIONS, INC.,)	
TRANS UNION, LLC, EQUIFAX)	
INFORMATION SERVICES, LLC,)	
LEXISNEXIS RISK SOLUTIONS, INC., and)	
UNKNOWN DOES 1-100,)	
)	
Defendants.)	

**TRANS UNION LLC’S MOTION TO
DISMISS PLAINTIFF’S THIRD AMENDED VERIFIED COMPLAINT**

Defendant Trans Union LLC (“Trans Union”) hereby files this Motion to Dismiss Plaintiff’s Third Amended Verified Complaint (“Complaint”) pursuant to Federal Rule of Civil Procedure 12(b)(6) and moves the Court to dismiss Plaintiff Nelson L. Bruce’s (“Plaintiff”) Complaint on the grounds that Plaintiff fails to allege facts sufficient to support a claim for relief.

For the reasons set forth in Trans Union’s accompanying Memorandum in Support, Trans Union respectfully requests that this Court grant Trans Union’s Motion and dismiss Plaintiff’s Complaint pursuant to Rule 12(b)(6).

Respectfully Submitted,

s/ Wilbur E. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of June 2024, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

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I further certify that I forwarded a copy of the foregoing by U.S. First Class Mail to the following non-CM/ECF participants:

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